

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS**

MARIA ALEJANDRA CELIMEN SAVINO,
JULIO CESAR MEDEIROS NEVES, and all
those similarly situated,

Petitioners-Plaintiffs,

v.

STEVEN J. SOUZA,

Respondent-Defendant.

Case No. 1:20-cv-10617 WGY

DECLARATION OF ANDY O'LAUGHLIN

I, Andy O'Laughlin, declare as follows:

1. I am a member in good standing of the Bar of this Court and an attorney at Wilmer Cutler Pickering Hale and Dorr LLP, counsel for Plaintiffs in the above-captioned action. I respectfully submit this declaration for the purpose of transmitting certain documents filed in support of Plaintiffs' Motion to Compel Compliance with Rule 34 Notice of Inspection.

2. Attached hereto as **Exhibit A** is a true and correct copy of Docket Entry 45 in *Chunn v. Edge*, No. 20-cv-1590 (RPK) (E.D.N.Y. Apr. 15, 2020).

3. Attached hereto as **Exhibit B** is a true and correct copy Docket Entry 3000 in *Braggs v. Dunn*, No. 2:14-cv-00601 (MHT) (M. D. Ala. Oct. 1, 2020).

4. Attached hereto as **Exhibit C** is a true and correct copy of Plaintiffs' Requests for Inspection to Defendant served on July 14, 2020.

5. Attached hereto as **Exhibit D** is a true and correct copy of an email chain between Thomas Kanwit and Mike Brown between July 14, 2020 and July 23, 2020.

6. Attached hereto as **Exhibit E** is a true and correct copy of Defendant's Response to Requests for Inspection served on September 4, 2020.

7. Attached hereto as **Exhibit F** is a true and correct copy of an email chain between Thomas Kanwit and Mike Brown between September 4, 2020 and September 8, 2020.

8. Attached hereto as **Exhibit G** is a true and correct copy of Docket Entry 159 in *Coreas v. Bounds*, No. 20-cv-00780-TDC (D. Md. July 30, 2020).

9. Attached hereto as **Exhibit H** is a true and correct copy of Docket Entry 58 in *Garcia v. Wolf*, No. 20-cv-00821 (E.D. Va. Aug. 18, 2020).

10. Attached hereto as **Exhibit I** is a true and correct copy of a letter from the Massachusetts Department of Public Health to Steven Souza, dated July 8, 2020.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on October 23, 2020, at Boston, Massachusetts.

/s/ Andy O'Laughlin
Andy O'Laughlin

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants on October 23, 2020.

/s/ Andy O'Laughlin
Andy O'Laughlin